



Rhode Island Lawyers for the Public Interest

February 4, 2019

Jennifer L. Wood
Executive Director
Miriam Weizenbaum
Chair

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

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Re: Docket 4890

Dear Ms. Massaro:

Enclosed please find an original and 10 copies of the following document:

- Rhode Island Center for Justice's Motion to Intervene on behalf of the George Wiley Center

Please note that an electronic copy of this document has been provided to the service list in Docket 4890.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer L. Wood", with a long horizontal flourish extending to the right.

Jennifer L. Wood

Enclosure – Motion to Intervene
cc: Docket 4890 Service List (*via electronic mail*)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NARRAGANSETT BAY COMMISSION
GENERAL RATE FILING

DOCKET NO. 4890

MOTION FOR INTERVENTION

The George Wiley Center hereby moves, through counsel, to intervene in the above-captioned proceeding pursuant to Rule 1.14 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”) (R.I. Code of Regulations, Title 810, Chapter 00, Subchapter 00, Part 1, Section 1.14, previously Rule 1.13). In support of this motion, the George Wiley Center states the following:

1. The George Wiley Center is grassroots, community-based organization comprised of low-income consumers and focused on advocacy for social and economic justice in our state. The George Wiley Center works in partnership with its counsel, The R.I. Center for Justice, a nonprofit public interest law center, to provide legal assistance to low-income individuals and families across the State relating to their rights as consumers.
2. The George Wiley Center has been a leading voice advocating for the interests of low-income consumers in Rhode Island for more than twenty-five years.
3. On October 10, 2018, Narragansett Bay Commission (“NBC”) filed a General Rate Filing with the Rhode Island Public Utilities Commission (“PUC”) and the Commission opened Docket No. 4890.
4. In this Docket, the Commission will review NBC’s proposal to increase residential rates.
5. The George Wiley Center advocates for and works with low-income consumers, many of whom reside in the NBC service area and will be directly affected by the NBC’s proposed increase to residential rates. Through its counsel at the R.I. Center for Justice, the George Wiley Center also facilitates legal representation for low-income consumers seeking to protect their

rights as consumers under the law. The George Wiley Center conducts meetings and workshops with low-income consumers on a regular basis in order to remain fully informed about the lived experience of low-income consumers, particularly as it relates to their challenges in maintaining affordable utility services in the homes they own and rent.

6. Affordability is a central consideration to the PUC's review of the NBC rate proposal and the George Wiley Center is uniquely capable to help to inform issues of rate affordability for affected low-income consumers due to its extensive work with these affected consumers over several decades.

7. Intervention in Commission proceedings is governed by Rule 1.14 of the Commission's Rules of Practice and Procedure, which states at Rule 1.14(B):

Subject to the provisions of these rules, any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission. Such right or interest may be:

1. A right conferred by statute.
2. An interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding. (The following may have such an interest: consumers served by the applicant, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)
3. Any other interest of such nature that movant's participation may be in the public interest.

8. In addition, Rule 1.14(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

9. Counsel for the George Wiley Center has contacted the NBC and the Division of Public Utilities and Carriers (the Division) to determine whether either of these entities objects to the intervention of the George Wiley Center in this Docket. Counsel for the Division indicates that the Division takes no position on the Motion. Counsel for the George Wiley Center provided

information regarding this Motion to counsel for the NBC by both telephone and email and has received no position from the NBC¹.

10. As stated more fully above, the George Wiley Center has extensive experience working with and advocating for low-income consumers, work which is often focused on the affordability of rate increases for low-income consumers.

11. The George Wiley Center has participated, without objection, in many previous PUC Dockets including, most recently, Dockets 4651, 4770, and 4780.

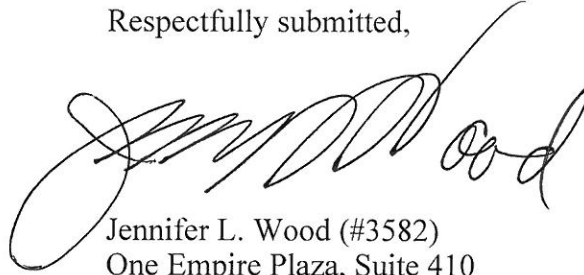
12. The George Wiley Center's participation in this docket as an advocate for low-income utility consumers should be granted because the George Wiley Center is able to bring forward the rights and interests of low-income consumers directly affected by the docket, which interests are not adequately represented by existing parties to the docket, (Rule 1.14(B)(2)) and the George Wiley Center is able to share the perspective and concerns of low-income consumers affected by the NBC filing and the inclusion of a voice for low-income consumers in this proceeding is in the public interest (Rule 1.14(B)(3)).

13. Although this Motion to Intervene is filed after the time for intervention published in the Procedural Schedule for the Docket, it is filed in advance of the February 20, 2019 hearing date to ensure, consistent with Rule 1.14(F), that the proceeding will not be delayed nor will the intervention cause prejudice or hardship to the parties.

WHEREFORE, the George Wiley Center, through its counsel the R.I. Center for Justice, requests that the Commission grant its Motion to Intervene and that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

¹ Counsel for the Wiley Center is respectfully aware that counsel for NBC has experienced a death in the family at the time of these communications and extends condolences.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Wood", written in a cursive style.

Jennifer L. Wood (#3582)
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Dated: February 4, 2019

CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2019, I mailed this original pleading and 10 copies to the Public Utilities Commission and sent a true copy of the document by electronic mail to the parties in the Docket 4890 Service List as of February 4, 2019.